IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

WESLEY DANIEL VINEY,

Plaintiff,

v. Civil Action No.: 22-ev-00041-LKG

CRAIG ROBERSON, et al.

Defendant.

REQUEST FOR EXTENSION OF TIME TO FILE RESPONSE

Defendants Craig Roberson [sic]¹ and Daniel Lasher, by and through their attorneys T. Lee Beeman, Jr., County Attorney for Allegany County, Maryland, move, pursuant to Fed.R.Civ.P. 6(b)(1)(A) and Standing Order 2012-01 (D.Md. 2012), for an extension of time to and including August 9, 2022, to file a response to the complaint filed in the above-captioned case, and in support thereof, states the following:

- 1. Undersigned counsel accepts service of process on behalf of Defendants.
- 2. Defendants' response is due to be filed on Friday, June 10, 2022.
- 3. Although certain information and materials relating to the complaint herein have now been received by undersigned counsel, it is necessary to obtain additional documents including declarations, so that Defendants can prepare and file an appropriately detailed response.
- 4. An additional sixty (60) day period to and including August 9, 2022, within which to respond to the Complaint should be sufficient to prepare Defendant's initial pleadings.
 - 5. This Motion is not made for purposes of delay.

¹ Craig Robertson is the Sheriff of Allegany County, Maryland and the proper Defendant in this matter.

WHEREFORE, it is respectfully requested that this Court grant leave for Defendant to file a response in the instant case on or before August 9, 2022.

Respectfully submitted,

OFFICE OF THE COUNTY ATTORNEY FOR ALLEGANY COUNTY, MARYLAND

T. Lee Beeman, Jr., Bar Number: 19613 701 Kelly Road, 4th Floor Cumberland, Maryland 21502

Tel: (301) 777-5823 Fax: (301) 724-6970

Email: lbeeman@blpblaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 9th day of June, 2022, a copy of the foregoing Motion for Extension of Time to File Response was mailed, postage prepaid, to:

Wesley D. Viney, DOC #485438 MCTC 18800 Roxbury Road Hagerstown, MD 21746

/ s /
T. Lee Beeman, Jr., Bar Number: 19613